



Churdar Law Firm

Douglas A. Churdar

December 22, 2021

VIA CERTIFIED/RETURN RECEIPT MAIL

Mr. Randy Hemphill
2004 Clary Connector
Eastanollee, GA 30538

RE: Service on Hemphill & Son, Inc.
Michael Orland Sharpe. v. Hemphill & Son, Inc., and
Harvey Edward Ledsome
Case No.: 2021-CP-42-04256

Dear Mr. Hemphill:

Enclosed are two (2) copies of the Summons and Complaint in the above-referenced matter, which are served upon you as statutory agent for the Defendant, Hemphill & Son, Inc.

Thank you very much.

Sincerely,

Jeanne M. Fulkerson, Paralegal
Churdar Law Firm

jmf
Enclosure(s)

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF SPARTANBURG)	
)	C.A. No.: 2021-CP-42-
Michael Orland Sharpe,)	
)	
Plaintiff,)	SUMMONS
)	
vs.)	
)	
Hemphill & Son, Inc. and Harvey Edward)	
Ledsome,)	
)	
Defendant.)	

TO: DEFENDANTS ABOVE-NAMED.

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, a copy of which is hereby served upon you, and to serve a copy of your Answer to the Complaint on the subscriber at 304 Pettigru Street, Greenville, SC 29601, within thirty (30) days from the date of service hereof, exclusive of the date of such service. If you fail to answer the Complaint within the time of aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

Date: December 20, 2021

By: /s/ Douglas A. Churdar
Douglas A. Churdar
S.C. Bar No. 11971
304 Pettigru Street
Greenville, SC 29601
Phone: (864) 233-0203
Fax: (864) 233-3020
Email: dachurdar@churdarlaw.com

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF SPARTANBURG)	
)	C.A. No.: 2021-CP-42-
Michael Orland Sharpe,)	
)	
Plaintiff,)	COMPLAINT
)	
vs.)	
)	
Hemphill & Son, Inc. and Harvey Edward)	
Ledsome,)	
)	
Defendant.)	

Plaintiff, complaining of Defendants, would respectfully show unto the Court that:

I.

Plaintiff is a citizen and resident of Greenville County, South Carolina.

II.

Defendant Hemphill & Son, Inc. is a corporation organized and existing pursuant to the laws of the State of Georgia and doing business in Spartanburg County, South Carolina.

III.

Defendant Harvey Edward Ledsome is a citizen and resident of Stephens County, Georgia. At all times relevant, he was employed by Hemphill & Son, Inc.

IV.

On or about January 4, 2019, Plaintiff was stopped in traffic on I-85 South in Spartanburg County, South Carolina. At the same time, Defendant Harvey Edward Ledsome was operating a vehicle owned by Defendant Hemphill & Son, Inc. and traveling behind Plaintiff on I-85. Defendant Harvey Edward Ledsome Defendant ran into the rear of Plaintiff's vehicle.

V.

Defendant's actions were negligent in that he failed to keep a proper lookout and failed to maintain control over his vehicle.

VI.

As a direct and proximate result of Defendants negligence and recklessness, Plaintiff sustained serious injuries and impairment, which required expensive and extensive medical treatment, as well as other damages. In addition, Plaintiff's vehicle was totaled.

WHEREFORE, Plaintiff prays for a verdict including actual and, if warranted by the evidence, punitive damages and for such other and further relief as the Court may deem just and proper.

Date: December 20, 2021

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